THE GAME FISHING ASSOCIATION OF AUSTRALIA

Marine Park Submission

The Game Fishing Association of Australia

The Game Fishing Association of Australia (GFAA) is the longest-established national fishing organisation in the world and has represented Australia's game fishing community for more than 85 years. Through our state associations, more than 85 affiliated clubs and approximately 10,000 active members, GFAA has a national footprint across Australia. Conservation and the responsible use of marine resources are fundamental to GFAA and embedded in our Constitution.

GFAA has been involved in marine park planning from the beginning. We have participated in successive consultation processes, contributed local knowledge and fishing information, and consistently supported genuine, evidence-based marine conservation. Despite this long involvement, we believe there remains considerable scope to improve how the planning and management of Australia's marine park network understands, acknowledges and considers the values of game fishers.

Too often, consultation has involved commenting on proposals that are already well advanced, with limited substantive change once they are released for public comment. Experience also suggests that some stakeholder groups have had greater opportunities to shape proposals during their development. This has contributed to a perception that stakeholders do not always have an equal opportunity to influence marine park design and management.

The knowledge held within the game fishing community, the importance of established fishing grounds, our contribution to science and research, and the social, economic and cultural value of fishing access have not always been given the weight they deserve. Over time, this has reduced confidence that participation in consultation will meaningfully influence outcomes.

The current review of Commonwealth marine park management plans provides an important opportunity to improve this approach and strengthen the relationship with Australia's game fishing community. GFAA is again participating in good faith and believes this review should demonstrate that lessons have been learned from previous processes. That means involving fishers early, genuinely using their knowledge, clearly demonstrating the need for restrictions where they are proposed, and developing management arrangements that deliver strong conservation outcomes while recognising that responsible game fishing belongs in Australia's marine parks.

Australia leads the world in marine protection

Australia already has one of the world's largest marine park networks, covering 4.6 million km², or around 52% of Australian waters. About 2.2 million km², or 24% of Australian waters, is classified as highly protected and closed to game fishing.

Under its 30x30 commitment, the Australian Government has committed to increasing highly protected areas to 30% by 2030. This commitment requires 524,000 km² of additional no-fishing areas. It is important these new no fishing areas avoid unnecessarily restricting access to important and popular game fishing grounds.

Current proposals to expand the Lord Howe and Norfolk Island marine parks would take Australia beyond the Government's 30% target. Both parks are in remote ocean waters, hundreds of kilometres from the Australian mainland. The Lord Howe proposal would increase the size of the marine park by

250%, with no-fishing areas increasing from 4% to 78% of the park. The Norfolk Island proposal would increase the marine park by 130%, with no-fishing areas increasing from 22% to 94% of the park.

At the same time, the Government has announced reviews of management plans for the Coral Sea, Temperate East, South-west, North-west and North marine park networks. It is important these reviews ensure Australian fishers retain access to important game fishing grounds.

A key question is whether 30x30 is intended to apply to 30% of Australian waters nationally, or separately to each marine park network. The 2025 review of the South-east Marine Parks Network set a concerning precedent, with no-fishing areas increasing from 40% to 87% of the network.

If 30% is a national target, the proposed Lord Howe and Norfolk Island expansions would take Australia beyond its international commitment without requiring further fishing closures through the current management plan reviews. Applying a 30% highly protected target to every marine park network would result in protection well beyond Australia's national commitment, impose significant and unnecessary social costs on communities that use and value these waters and show the Lord Howe and Norfolk Island proposals and the 2025 South-east network review to be excessive.

When reviewing marine parks management plans, we ask the Australian Government to:

- Recognise game fishing as a valued, low-impact activity that provides significant social, cultural, economic and wellbeing benefits.
- Avoid blanket expansions of no-fishing areas and instead prioritise measures that deliver demonstrable and measurable conservation outcomes, such as habitat restoration, pollution control, pest species eradication and preventing illegal fishing.
- Only restrict game fishing where there is clear scientific evidence that it presents an unacceptable risk to a specific conservation value, and in those circumstances apply the least restrictive measure capable of achieving the required conservation outcome.
- Work collaboratively with game fishers to develop simple, practical management arrangements that are easy to understand and regularly reviewed to confirm they are delivering their intended conservation outcomes while supporting quality fishing experiences.

Australia’s approach compared to other countries

There is a clear international pattern of countries establishing their largest highly protected no-fishing marine park areas in remote ocean waters, far from major population centres and mainland game fishing grounds. This allows countries to protect very large areas of ocean while limiting impacts on the places where most of their citizens live, boat and fish.

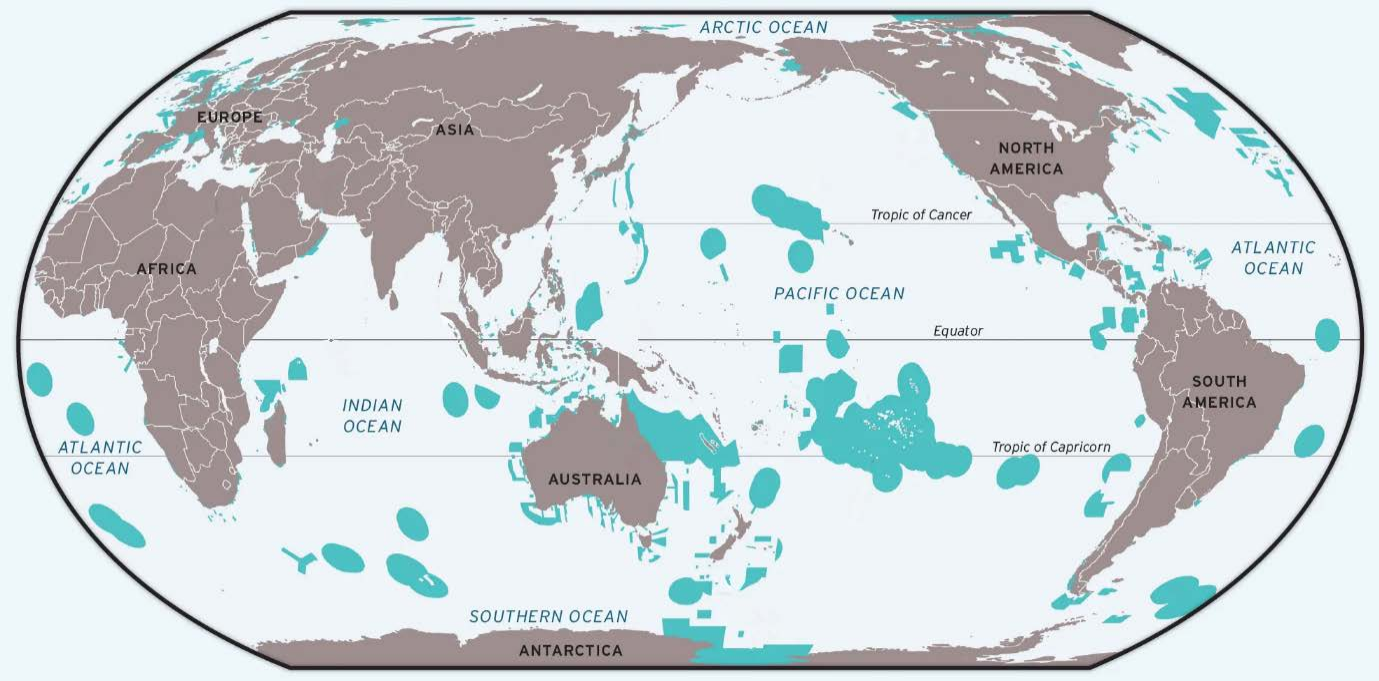
The following map illustrates this pattern. Many of the world's largest highly protected no-fishing areas are located thousands of kilometres from major population centres, particularly across the Pacific, Atlantic, Indian and Southern oceans.

The United States, for example, has established enormous, no fishing areas around remote Pacific islands, including Papahānaumokuākea and the Pacific Remote Islands, rather than concentrating this level of protection along the heavily populated continental US coastline. The United Kingdom has similarly established much of its no fishing areas around distant Overseas Territories including Pitcairn, Ascension, Tristan da Cunha, South Georgia and the South Sandwich Islands.

Chile's Rapa Nui (Easter Island) provides another striking example. Rapa Nui lies in the Pacific Ocean approximately 3,700 km from mainland Chile, while the Juan Fernández Islands are also isolated well offshore. France has likewise established very large no fishing areas around its distant Pacific and Southern Ocean territories.

Australia also protects remote offshore waters. However, Australia differs from many other major marine-protection nations because a comparatively large proportion of our highly protected areas occur around the mainland in proximity to populated areas.

This distinction matters to game fishers. A square kilometre of no-fishing area thousands of kilometres from a major population centre has very different social consequences from a square kilometre covering a popular fishing ground readily accessible to thousands of people. As Australia considers further expansion of highly protected areas, the Government should explain why additional restrictions on accessible and valued game fishing grounds are considered necessary, particularly where current proposals can achieve Australia's international conservation commitments with minimal impacts on game fishing.



Why the process matters more than the percentage

The 2025 review of the South-east Marine Parks Network shows why the way an area is protected is more important than the amount of ocean protected.

During the review, black coral was identified at a depth of around 80 metres at Joe's Reef in the Freycinet Marine Park. A no-fishing zone was subsequently placed over the area, even though the game fishing occurring there involved trolling for pelagic species in the surface waters, well above the coral habitat.

A Habitat Protection Zone (IUCN Category IV) could have directly protected the black coral by prohibiting activities that could physically damage it, such as anchoring, trap-setting and bottom fishing, while continuing to allow pelagic fishing above. This approach would have protected the identified conservation value without unnecessarily restricting game fishing.

However, this option was not pursued, in part because an IUCN Category IV zone does not count as "highly protected" for the purposes of Australia's marine protection targets.

This highlights a broad concern with a percentage-driven approach to marine protection. Management decisions should start by identifying the conservation value, determining the actual risks to that value, and then applying the least restrictive management measure capable of addressing those risks. The objective should be effective conservation, not simply maximising the percentage of ocean classified as highly protected.

Joe's Reef illustrates the risk of allowing a classification target to drive management rather than allowing the identified conservation risk to determine the management response. The sequence

should be simple: identify the value, assess the risk, apply the appropriate management response, and only then consider its classification.

A consultation process that does not reflect game fishers' standing

During the current public submission period, the Government engaged Seafood Industry Australia, a national commercial seafood industry body, to undertake consultation with recreational fishers. While game and commercial fishing are both important users of Australia's marine environment, they are distinct sectors with different values, motivations, interests and relationships with the marine environment.

Game fishing is primarily a social and cultural activity, valued for the experiences it provides individuals, families and communities, including connection with nature, wellbeing, food gathering and participation in coastal and regional life. Commercial fishing is an economic activity undertaken by businesses harvesting seafood for sale. Both perspectives are legitimate, but one cannot reasonably be expected to adequately undertake consultation on behalf of the other.

Engaging a commercial industry association to consult with recreational fishers is not a substitute for genuine, direct engagement with the game fishing community and its representative organisations. It reinforces a broader concern that game fishing is too often treated simply as another form of fishing, rather than recognised as a distinct stakeholder group with its own values, interests and legitimate standing in marine park decision making.

Experiences like this compound longstanding frustration with marine park consultation. When consultation is perceived as a box ticking process for validating predetermined outcomes rather than genuinely informing decisions, trust in the process suffers. That extends beyond individual zoning decisions and can undermine confidence in marine management more broadly, particularly among coastal and regional communities that expect decisions affecting the places they value to be made with them, not simply for them.

The public comment on draft management plans due mid 2027 should provide game fishers with a dedicated consultation pathway, supported by direct engagement with recognised game fishing organisations and communities in the areas affected by any proposed zoning changes.

Restrictions should respond to demonstrated risk

Game fishers support genuine marine conservation and support marine parks that deliver measurable environmental benefits, protecting what needs to be protected using the least restrictive tool capable of achieving the specific conservation objective.

A recent study, an output partly funded through the Australian Government's Commonwealth marine park science program (the NESP Marine Biodiversity Hub, with several co-authors supported through this funding) and used by DCCEEW as evidence for the effectiveness of no-fishing areas found that in two-thirds of the no fishing areas examined there was no measurable improvement in biodiversity or abundance. The study suggested the reason no fishing areas in Australia did not show the same benefits to biodiversity and abundance as comparable no fishing areas studied in other parts of the world was due to Australia's existing comprehensive fisheries management arrangements. Given this, the case for further expansion of blanket no fishing areas is not well supported by the evidence base the Government itself has relied on, including evidence produced through its own Commonwealth marine park funding.

Over the past decade, considerable attention has been given to promoting the extent of Australia's marine park network. Less attention has been given to demonstrating conservation outcomes. The recent Commonwealth funded independent review of the marine parks assessed only the extent to which management plans had been implemented rather than how effective these management plans had been at conserving biodiversity, improving abundance or supporting ecologically sustainable use.

Invest in understanding game fishing

Despite game fishers being major users of Commonwealth marine parks and being directly affected by zoning decisions there has been limited investment to quantify game fishing effort, catch, fishing mortality and impact on specific conservation values, or to determine the social and economic benefit game fishing in marine parks generates.

Since 2018 Australian government marine park research investment has overwhelmingly concentrated on identifying, mapping and monitoring natural conservation values, threatened species, ecological condition and, increasingly, First Nations cultural values and Sea Country management. The small number of projects that have touched on game fishing have largely only focused on compliance and perceptions. Without further research on game fishing, it is difficult to demonstrate how any additional fishing restrictions are necessary, proportionate or represent the most effective means of achieving a particular conservation objective.

The Government should invest in properly understanding both the biological impact of game fishing and the economic and social value it provides, so that future zoning decisions can be based on demonstrated risk and proportionate management responses can be implemented.

Invest in outcomes that go beyond the 30% target

The Government's 30x30 commitment will effectively be met if the current proposals for Lord Howe and Norfolk Islands proceed. Once that target is achieved, the focus should shift from increasing the percentage of ocean classified as highly protected to investing in measurable improvements in marine biodiversity, ecosystem health and fishing experiences.

This could include large-scale habitat restoration; a national network of FADs capable of monitoring ocean conditions; a network of artificial reefs; pest and invasive species control; reducing marine pollution; tackling illegal fishing; and expanding citizen science programs such as the NSW Game Fish Tagging Program.

Game fishers are a major user group of Commonwealth marine parks. They release much of what they catch, contribute substantial economic activity to coastal and regional communities, and, for many species can provide the only source of important information that would otherwise be difficult or costly to collect.

Ecologically sustainable use is an objective of marine park management. The Government should therefore invest in understanding and supporting what sustainable use looks like in practice. The percentage of ocean classified as highly protected is a measure of management input, not evidence of a conservation outcome. Beyond 30x30, success should increasingly be measured by demonstrable improvements in biodiversity, habitat condition, fishing experiences and ecosystem resilience.

The voice of Australia's game fishing community

This submission is supported by a separate GFAA campaign submission signed by 1,125 members of GFAA-affiliated game fishing clubs from across Australia.

These are not anonymous expressions of support. They are real people with a direct connection to the waters being considered through these reviews. They are members of local game fishing clubs who regularly fish Commonwealth waters. They live in coastal and regional communities, run and work in local businesses, volunteer in local clubs, raise families whose children attend local schools, and spend money on boats, fuel, accommodation, tackle, servicing and tourism in the communities from which they fish.

Their interest in Commonwealth marine parks is therefore practical and personal. Decisions about access to reefs, canyons, banks, seamounts, continental shelf waters and established game fishing grounds directly affect how and where they fish, the clubs and competitions in which they participate, and the coastal communities that support those activities.

This is an important distinction when considering submissions generated through national online campaigns. Digital campaigning makes it possible to generate very large numbers of responses from people with varying levels of direct connection to the places under consideration. GFAA's campaign was deliberately directed through Australia's established game fishing network. The names attached to this submission represent people connected to affiliated clubs and to the fishing grounds potentially affected by these management plans. Their views should be recognised as the voices of people who use, know and value these waters.

Importantly, the 1,125 signatories were not asked to oppose marine parks. They signed a statement expressly supporting well-managed marine parks that protect Australia's marine environment while providing for sustainable recreational fishing. They asked that recreational fishing be recognised as a valued low-impact activity; access to important fishing grounds be retained; restrictions only be imposed where fishing presents a scientifically demonstrated unacceptable risk; the least restrictive effective management response be used; and recreational fishers be treated as partners in management, science and stewardship. GFAA

What game fishers are telling us

The additional comments accompanying the campaign provide an important qualitative picture of what matters to Australia's game fishing community. While individual comments reflect local circumstances, five consistent themes emerge nationally.

Fishers want existing fishing access protected.

The strongest message is concern about the progressive loss of established fishing grounds. Fishers do not accept that achieving marine conservation objectives must automatically require excluding recreational fishing. Reefs, canyons, shelf edges, banks, seamounts and other offshore features are not interchangeable: particular locations have developed significance through accessibility, target species, seasonal aggregations, fishing history and generations of accumulated local knowledge.

Fishing has significant social and community value.

Comments repeatedly describe fishing in terms of family, friendships, lifestyle, wellbeing, community and opportunities for future generations. For many signatories, game fishing is not simply the act of catching a fish. It provides connection with the marine environment, brings families and friends together, sustains volunteer clubs and contributes to the identity and economy of coastal communities. This reinforces GFAA's broader submission that the social and cultural consequences of closing an accessible fishing ground can be very different from protecting an equivalent area in remote waters.

Game fishers see their activity as compatible with conservation.

Many signatories emphasise the predominantly pelagic and catch-and-release nature of game fishing and question the conservation benefit of prohibiting surface trolling where the conservation value being protected is not affected by that activity. This reflects the principle illustrated elsewhere in this submission by Joe's Reef: management should address the activity presenting the risk rather than unnecessarily exclude activities that do not.

Restrictions need to be supported by evidence of actual risk.

A recurring proposition throughout the comments is straightforward: identify the conservation value, establish the risk posed by game fishing, and then apply a proportionate response to that risk. Fishers are particularly concerned by the prospect of percentage-based protection targets becoming a substitute for this process.

Game fishers want a genuine role in marine park planning.

The comments demonstrate considerable local knowledge of offshore waters, species, seasons and fishing practices. Fishers want that knowledge considered before zoning proposals are developed, rather than being asked to comment after important decisions have effectively been made. This is consistent with GFAA's request elsewhere in this submission for direct engagement with recognised game fishing organisations and affected communities.

These themes are accompanied by concerns about the economic contribution of recreational fishing and game fishing tourism, the cumulative loss of access through State and Commonwealth restrictions, the equity of restrictions between different marine users, and the need to invest in positive conservation measures such as research, tagging, habitat improvement and citizen science rather than relying predominantly on spatial exclusion.

The places that matter

The comments also demonstrate why national marine park planning needs to understand fishing at a local level. Game fishing activity is concentrated around particular offshore features and productive waters. Losing access to one important ground cannot necessarily be compensated for by leaving an equivalent area of ocean open somewhere else.

In Western Australia, the Rottnest Trench and Perth Canyon emerge particularly strongly as established and accessible game fishing grounds for the Perth metropolitan game fishing community. Signatories also identify important offshore game fishing waters associated with Broome, Ningaloo and Exmouth, and Geographe Bay and the South West. These concerns need to be considered alongside the cumulative effect of existing State and Commonwealth restrictions on WA fishers.

In Queensland, the geographic spread of responses reflects the extraordinary importance of game fishing along the Queensland coast, including Cape York and Weipa, Cairns and Far North Queensland, Townsville, the Whitsundays, Mackay, Hervey Bay and the offshore Coral Sea. These are not simply recreational locations; game fishing forms part of the social and economic fabric of many of these communities. The Queensland Game Fishing Association represents 19 clubs and more than 2,000 members and notes that its members predominantly target pelagic species, largely practice catch-and-release fishing and have a long history of contributing to tagging, research and citizen science.

The Queensland experience also illustrates the importance of considering cumulative access. QGFA has specifically asked that existing Commonwealth and State marine parks and other restricted areas be considered before additional closures are contemplated and that alternatives such as monitoring, seasonal measures, catch controls and gear restrictions be assessed before permanent spatial closure.

In New South Wales, the comments are geographically dispersed along the coast rather than dominated by a single location. This reinforces the importance of maintaining access to the continental shelf, shelf edge, canyons and offshore game fishing grounds used by clubs along the NSW coast, including waters associated with the Temperate East Marine Parks Network. NSW comments also place particular emphasis on genuine representation and involving fishers in decisions affecting their established grounds.

In Victoria, access to productive continental shelf and shelf-edge waters is particularly important. The physical geography of the Victorian coastline means opportunities for game fishers to reach productive offshore waters can already be limited. Where marine park boundaries intersect those accessible offshore grounds, relatively small spatial changes can therefore have disproportionately large consequences for the game fishing community.

In South Australia, signatories identify the importance of the deep shelf, drop-off and offshore waters around and south of Kangaroo Island, along with other established offshore grounds used by South Australian game fishers. The campaign material itself uses the deep shelf and offshore grounds southwest of Kangaroo Island as an example of the type of locally important area fishers want retained.

In Tasmania, the number of comments is smaller, but the message is consistent: access to productive offshore and shelf waters matters to local game fishers, and decisions about those waters have social and family consequences that cannot be understood simply by measuring the number of square kilometres affected.

1,125 people, one consistent message

There is an important consistency between the formal position put forward by GFAA and what its members are saying through the campaign.

The 1,125 signatories are not arguing against marine conservation. They are asking for a model of marine conservation in which sustainable game fishing is recognised as a legitimate use of Commonwealth marine parks. Their collective message can be distilled to four propositions:

- retain access to important game fishing grounds unless there is a demonstrated conservation reason not to;
- recognise game fishing as a generally low-impact activity and manage the particular activity that presents a demonstrated risk rather than defaulting to blanket exclusion;
- properly account for the social, family, community and regional economic consequences of removing fishing access; and
- involve the people who actually fish these waters, and their representative organisations, in designing the management arrangements that will apply to them.

That message closely reflects the principles on which the 1,125 people put their names to the GFAA campaign: healthy marine ecosystems and quality recreational fishing experiences should be treated as complementary objectives, not competing ones.

It should carry considerable weight in these reviews. These are the people who will live with the consequences of the management plans now being developed, and whose knowledge, participation and support will ultimately be important to their long-term success.

Closing

Australia can meet 30x30 and maintain world-class game fishing. These objectives are not mutually exclusive.

Game fishers support genuine marine conservation and want marine parks that deliver measurable environmental outcomes. Where game fishing presents an unacceptable risk to an identified conservation value, proportionate management is justified although exclusion of fishing should always be a management option of last resort.

With Australia on track to meet its 30x30 commitment, the focus should shift from how much ocean is protected to how well it is protected. Going beyond the 30% target without a clearly demonstrated conservation need risks imposing significant social costs for uncertain environmental benefit and would further undermine community confidence and support for marine parks.

Looking past 30x30 management should focus on delivering tangible outcomes: better science, healthier habitats, reduced pollution, control of invasive species and illegal fishing, and building stronger partnerships with game fishers in monitoring, citizen science and stewardship.

Game fishing is a legitimate and valued use of Australia's marine environment. Fishers should not simply be viewed as users to be regulated or excluded, but as partners in caring for the marine environment. Marine parks that protect identified conservation values while providing for sustainable game fishing will be more likely to retain the confidence, participation and support of the communities they affect.

The success of Australia's marine parks should be measured by healthier marine ecosystems, demonstrable conservation outcomes and stronger community stewardship not by the number of square kilometres closed to fishing.